IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

MICHAEL T. CHRISLEY and JULIE H. CHRISLEY,)	
Plaintiffs,)	Civil Action No.
v.)	1:19-cv-4610-LMM
JOSHUA WAITES,)	
Defendant.))	

AMENDED NOTICE OF INTENT TO SERVE SUBPOENAS

Pursuant to Federal Rule of Civil Procedure 45(b)(1), please take notice that Plaintiffs Michael T. Chrisley and Julie H. Chrisley (collectively, "<u>Plaintiffs</u>") hereby notify all parties of their intent to serve subpoenas commanding testimony at a deposition to the following:

- (1) Scott Santilli;
- (2) Jeff Mitchell;
- (3) Alex Kirkland;
- (4) Amy Doherty-Heinze;
- (5) Michael Lambros;
- (6) Katie Vancil;
- (7) Mark Braddock

- (8) LaShaun Wright; and
- (9) Katie Paulson.

Copies of the subpoenas Plaintiffs intend to serve are attached hereto as composite **Exhibit A.**

Respectfully submitted this 23rd day of August 2021.

/s/ Christopher S. Anulewicz

Christopher S. Anulewicz Georgia Bar Number 020914 canulewicz@balch.com Jonathan R. DeLuca Georgia Bar Number 228413 jdeluca@balch.com Patrick N. Silloway Georgia Bar Number 971966 psilloway@balch.com

BALCH & BINGHAM LLP

30 Ivan Allen Jr. Boulevard, Ste. 700 Atlanta, Georgia 30308 Telephone: (404) 261-6020 Fax: (404) 261-3656

Attorneys for Plaintiffs Michael T. Chrisley and Julie H. Chrisley

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of August 2021, I caused a copy of the foregoing **AMENDED NOTICE OF INTENT TO SERVE SUBPOENAS** to be electronically with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following counsel of record:

Annarita Leigh McGovern
Terry Long
Satcher & McGovern, LLC
288 S. Main Street
Suite 100
Alpharetta, Georgia 30009
amcgovern@satchermcgovernlaw.com

/s/ Christopher S. Anulewicz Christopher S. Anulewicz Georgia Bar Number 020914

EXHIBIT A

for the

		Norther	n District of	Georgia	
	JULIE H Pi JOSHU	CHRISLEY and CHRISLEY, Idintiff V. A WAITES, fendant))))	Civil Action No.	1:19-cv-4610-LMM
	SU	BPOENA TO TESTIFY A	AT A DEPO	SITION IN A CIVIL	ACTION
To:		1	MICHAEL LA	MBROS	
_		(Name of per	son to whom thi	s subpoena is directed)	
deposi party s or mor	tion to be taken in a serving this subpoer re officers, directors	this civil action. If you are an about the following matte	nn organization ers, or those sesignate other	on, you must promptly set forth in an attachme persons who consent	et forth below to testify at a confer in good faith with the ent, and you must designate one to testify on your behalf about.
Place	: Balch & Bingham LL 30 Ivan Allen, Jr. Bot Atlanta, Georgia 303	ulevard, N.W., Suite 700		Date and Time:	7/2021 10:00 am
	The deposition w	ill be recorded by this meth	od: Stenog	raphic and audiovisual m	neans.
					sition the following documents, g, testing, or sampling of the
	5(d), relating to yo		bject to a sub	poena; and Rule 45(e)	g to the place of compliance; and (g), relating to your duty to
Date:	08/23/2021				
		CLERK OF COURT		OR /s/	Christopher S. Anulewicz
		Signature of Clerk or De	puty Clerk		Attorney's signature
Thone	omo addrass a mai	l address, and telephone nu	mbor of the o	ttornov roprosonting (and of mantul
	el T. Chrisley and Juli		moer of the a		r requests this subpoena, are:
Christoph	ner S. Anulewicz, Balch	& Bingham LLP, 30 Ivan Allen, Jr.	Boulevard. N.W		

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this substitute (date)	opoena for (name of individual and title, if an	ıy)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follov	vs:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
fees are \$	for travel and \$	for services, f	or a total of \$	0.00
I declare under pe	enalty of perjury that this information is	s true.		
te:		Server's signa	uture	
		20111 233.00		
		Printed name ar	nd title	
		Server's addi	ress	

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- **(B)** Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) **Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:
- (A) *Documents*. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- **(D)** Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

for the

	Northern Distr	ict of Georgia		
JUL	EL T. CHRISLEY and LIE H. CHRISLEY, Plaintiff V. DSHUA WAITES, Defendant)) Civil Action))	on No.	1:19-cv-4610-LMM
	SUBPOENA TO TESTIFY AT A D	EPOSITION IN	NA CIVIL	ACTION
To:	SCOT	T SANTILLI		
	(Name of person to wh	nom this subpoena is	directed)	
deposition to be taker party serving this sub or more officers, dire	YOU ARE COMMANDED to appear an in this civil action. If you are an organ poena about the following matters, or tectors, or managing agents, or designate that Todd Chrisley, Julie H. Chrisley, Commander that the comments of	nization, you mus hose set forth in other persons w	st promptly an attachme ho consent	confer in good faith with the ent, and you must designate one to testify on your behalf about
	maer rodd Chrisiey, Julie H. Chrisiey, C	or Lindsie Chrisie	y Campbell	
Place: Balch & Bingha 30 Ivan Allen, J Atlanta, Georgia	r. Boulevard, N.W., Suite 700	Date and		08/2021 10:00 am
The deposition	on will be recorded by this method:	Stenographic and a	audiovisual m	neans.
	You, or your representatives, must also stored information, or objects, and mu	•	•	•
Rule 45(d), relating to	g provisions of Fed. R. Civ. P. 45 are a o your protection as a person subject to ena and the potential consequences of a	a subpoena; and		
Date:08/23/2021				
	CLERK OF COURT	OR	/s/	Christopher S. Anulewicz
	Signature of Clerk or Deputy Cle	rk		Attorney's signature
Michael T. Chrisley and	-mail address, and telephone number of Julie H. Chrisley	, W	ho issues or	r requests this subpoena, are:

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this substitute (date)	opoena for (name of individual and title, if an	ıy)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follov	vs:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
fees are \$	for travel and \$	for services, f	or a total of \$	0.00
I declare under pe	enalty of perjury that this information is	s true.		
te:		Server's signa	uture	
		20111 233.00		
		Printed name ar	nd title	
		Server's addi	ress	

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(g) Contempt.

for the

Northern	District of Georgia
MICHAEL T. CHRISLEY and JULIE H. CHRISLEY, Plaintiff V. JOSHUA WAITES, Defendant)) Civil Action No. 1:19-cv-4610-LMM))
SUBPOENA TO TESTIFY A	A DEPOSITION IN A CIVIL ACTION
То:	JEFF MITCHELL
(Name of perso	n to whom this subpoena is directed)
party serving this subpoena about the following matter or more officers, directors, or managing agents, or desithese matters: Matters regarding Michael Todd Chrisley, Julie H. Chris	
Place: Balch & Bingham LLP 30 Ivan Allen, Jr. Boulevard, N.W., Suite 700 Atlanta, Georgia 30308	Date and Time: 09/09/2021 10:00 am
The deposition will be recorded by this method	Stenographic and audiovisual means.
electronically stored information, or objects, as material:	at also bring with you to the deposition the following documents, and must permit inspection, copying, testing, or sampling of the
U 1	are attached – Rule 45(c), relating to the place of compliance; ect to a subpoena; and Rule 45(e) and (g), relating to your duty to es of not doing so.
Date:08/23/2021	
CLERK OF COURT	OP
	OR /s/ Christopher S. Anulewicz
Signature of Clerk or Depu	ty Clerk Attorney's signature
The name, address, e-mail address, and telephone num Michael T. Chrisley and Julie H. Chrisley	per of the attorney representing (name of party), who issues or requests this subpoena, are: pulevard, N.W., Suite 700, Atlanta, Georgia 30308

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

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I received this substitute (date)	opoena for (name of individual and title, if an	ıy)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follov	vs:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
fees are \$	for travel and \$	for services, f	or a total of \$	0.00
I declare under pe	enalty of perjury that this information is	s true.		
te:		Server's signa	uture	
		20110		
		Printed name ar	nd title	
		Server's addi	ress	

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(g) Contempt.

for the

Northern	District of Georgia		
MICHAEL T. CHRISLEY and JULIE H. CHRISLEY, Plaintiff V. JOSHUA WAITES, Defendant	-)) Civil A	ction No.	1:19-cv-4610-LMM
SUBPOENA TO TESTIFY A	T A DEPOSITION	IN A CIVIL	ACTION
To:	ALEX KIRKLAND		
(Name of perso	on to whom this subpoen	a is directed)	
deposition to be taken in this civil action. If you are an party serving this subpoena about the following matter or more officers, directors, or managing agents, or desthese matters: Matters regarding Michael Todd Chrisley, Julie H. Chris	rs, or those set forth ignate other persons sley, or Lindsie Chri	in an attachme who consent sley Campbell	ent, and you must designate one to testify on your behalf about
Place: Balch & Bingham LLP 30 Ivan Allen, Jr. Boulevard, N.W., Suite 700 Atlanta, Georgia 30308	Date a	and Time: 09/1	4/2021 10:00 am
The deposition will be recorded by this method	d: Stenographic ar	nd audiovisual n	neans.
☐ <i>Production:</i> You, or your representatives, mu electronically stored information, or objects, a material:	nd must permit insp	ection, copyin	ng, testing, or sampling of the
The following provisions of Fed. R. Civ. P. 45 Rule 45(d), relating to your protection as a person subgrespond to this subpoena and the potential consequence	ject to a subpoena; a	* * *	
Date:08/23/2021			
CLERK OF COURT	OR		
		/s/	Christopher S. Anulewicz
Signature of Clerk or Dep	uty Clerk		Attorney's signature
The name, address, e-mail address, and telephone num Michael T. Chrisley and Julie H. Chrisley Christopher S. Anulewicz, Balch & Bingham LLP, 30 Ivan Allen, Jr. B.		, who issues of	r requests this subpoena, are:

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this substitute (date)	opoena for (name of individual and title, if an	ıy)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follov	vs:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
fees are \$	for travel and \$	for services, f	or a total of \$	0.00
I declare under pe	enalty of perjury that this information is	s true.		
te:		Server's signa	uture	
		20110		
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(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- **(B)** Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) **Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:
- (A) *Documents*. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- **(D)** Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

for the

Northern	District of Georgia
MICHAEL T. CHRISLEY and JULIE H. CHRISLEY, Plaintiff V. JOSHUA WAITES, Defendant))) Civil Action No. 1:19-cv-4610-LMM)))
SUBPOENA TO TESTIFY A	T A DEPOSITION IN A CIVIL ACTION
To:	Y DOHERTY-HEINZE
	on to whom this subpoena is directed)
party serving this subpoena about the following matter	
Place: Wade Grunberg & Wilson LLC 600 Peachtree Street, N.E., Suite 3900 Atlanta, Georgia 30308	Date and Time: 09/16/2021 10:00 am
The deposition will be recorded by this metho	d: Stenographic and audiovisual means.
electronically stored information, or objects, a material:	ast also bring with you to the deposition the following documents, and must permit inspection, copying, testing, or sampling of the
	5 are attached – Rule 45(c), relating to the place of compliance; ject to a subpoena; and Rule 45(e) and (g), relating to your duty to ses of not doing so.
Date:08/23/2021	
CLERK OF COURT	OP
	OR /s/ Christopher S. Anulewicz
Signature of Clerk or Dep	uty Clerk Attorney's signature
The name, address, e-mail address, and telephone num Michael T. Chrisley and Julie H. Chrisley Christopher S. Anulewicz, Balch & Bingham LLP, 30 Ivan Allen, Jr. B	, who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this substitute (date)	opoena for (name of individual and title, if an	ıy)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follov	vs:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
fees are \$	for travel and \$	for services, f	or a total of \$	0.00
I declare under pe	enalty of perjury that this information is	s true.		
te:		Server's signa	uture	
		20110		
		Printed name ar	nd title	
		Server's addi	ress	

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

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- **(B)** Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
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- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
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 - (ii) ensures that the subpoenaed person will be reasonably compensated.

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(2) Claiming Privilege or Protection.

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 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

for the

Norther	rn District of	Georgia	
MICHAEL T. CHRISLEY and JULIE H. CHRISLEY, Plaintiff V. JOSHUA WAITES, Defendant		Civil Action No.	1:19-cv-4610-LMM
SUBPOENA TO TESTIFY A	AT A DEPOS	SITION IN A CIVIL	ACTION
To:	KATIE PAU	LSON	
(Name of per	son to whom thi	s subpoena is directed)	
Testimony: YOU ARE COMMANDED to a deposition to be taken in this civil action. If you are a party serving this subpoena about the following matt or more officers, directors, or managing agents, or dethese matters: Matters regarding Michael Todd Christ	an organization or those sesignate other	on, you must promptly set forth in an attachment persons who consent	confer in good faith with the ent, and you must designate one to testify on your behalf about
Place: Office of Aaron Hall, Attorney for Business Owners 3572 117th Lane NE Minneapolis, Minnesota 55449		Date and Time:	9/2021 10:00 am
The deposition will be recorded by this meth	od: Stenog	raphic and audiovisual m	neans.
Production: You, or your representatives, melectronically stored information, or objects, material: All documents and communication Chrisley, or Lindsie Chrisley Campuideo, social media post, or art Christophic Christophi	and must per ons in your pobell, as well a cicle you have	mit inspection, copyin ossession regarding Mi as any documents and	g, testing, or sampling of the ichael Todd Chrisley, Julie H. communications regarding any nael Todd Chrisley, Julie H.
The following provisions of Fed. R. Civ. P. 4 Rule 45(d), relating to your protection as a person su respond to this subpoena and the potential consequent	bject to a sub	poena; and Rule 45(e)	
Date: 08/23/2021			
CLERK OF COURT		OD	
		OR /s/	Christopher S. Anulewicz
Signature of Clerk or De	eputy Clerk		Attorney's signature
The name, address, e-mail address, and telephone nu Michael T. Chrisley and Julie H. Chrisley	mber of the a		ame of party) requests this subpoena, are:

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this substitute (date)	ppoena for (name of individual and title, if an	ny)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follow	vs:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
y fees are \$	for travel and \$	for services, fo	or a total of \$	0.00
I declare under po	enalty of perjury that this information is	s true.		
te:	_	Server's signa	uture	
		_		
		Printed name an	nd title	
		Server's addr	ress	

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
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(g) Contempt.

for the

		No	rthern District of	Georgia	
	JULIE H F JOSHI	C. CHRISLEY and I. CHRISLEY, Ilaintiff V. JA WAITES, Interpretation of the second seco))))	Civil Action No.	1:19-cv-4610-LMM
	SU	JBPOENA TO TESTI	FY AT A DEPO	SITION IN A CIVIL	ACTION
To:			KATIE V	ANCIL	
		(Name	of person to whom th	is subpoena is directed)	
deposition to learning to more office	be taken in this subpoe ers, director	this civil action. If you na about the following	are an organizati matters, or those or designate othe	on, you must promptly set forth in an attachm r persons who consent	et forth below to testify at a confer in good faith with the ent, and you must designate one to testify on your behalf about l.
	& Bingham LL n Allen, Jr. Bo a, Georgia 303	ulevard, N.W., Suite 700		Date and Time:	12/2021 10:00 am
The d	eposition w	vill be recorded by this	method: Steno	graphic and audiovisual r	neans.
	onically sto				sition the following documents, ng, testing, or sampling of the
Rule 45(d), re	lating to yo		on subject to a sul	opoena; and Rule 45(e)	g to the place of compliance; and (g), relating to your duty to
Date:08/	23/2021	CLERK OF COURT			
				OR /s/	Christopher S. Anulewicz
		Signature of Clerk	or Deputy Clerk		Attorney's signature
The name add	drage a ma	il addragg and talanhan	a number of the	attornay rangaantina /	agus of ngutu)
Michael T. Chri		il address, and telephon ie H. Chrisley	e number of the a		r requests this subpoena, are:
Christopher S. Anu	ılewicz, Balch	& Bingham LLP, 30 Ivan Alle	n, Jr. Boulevard, N.W		

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

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I received this substitute (date)	ppoena for (name of individual and title, if an	ny)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follow	vs:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
y fees are \$	for travel and \$	for services, fo	or a total of \$	0.00
I declare under po	enalty of perjury that this information is	s true.		
te:	_	Server's signa	uture	
		_		
		Printed name an	nd title	
		Server's addr	ress	

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(g) Contempt.

for the

	Northern Distric	ct of Georgia	
JULIE	T. CHRISLEY and H. CHRISLEY, Plaintiff V. IUA WAITES,)	Civil Action No.	1:19-cv-4610-LMM
L	Defendant)		
S	UBPOENA TO TESTIFY AT A DI	EPOSITION IN A CIVIL	ACTION
To:	MARK I	BRADDOCK	
	(Name of person to who	om this subpoena is directed)	
deposition to be taken in party serving this subpo or more officers, director	OU ARE COMMANDED to appear at in this civil action. If you are an organ ena about the following matters, or the ors, or managing agents, or designate all Todd Chrisley, Julie H. Chrisley, or	ization, you must promptly nose set forth in an attachm other persons who consent	confer in good faith with the ent, and you must designate one to testify on your behalf about
Place: Balch & Bingham L		Date and Time:	
30 Ivan Allen, Jr. B Atlanta, Georgia 30	Soulevard, N.W., Suite 700		02/2021 10:00 am
The deposition	will be recorded by this method:	tenographic and audiovisual r	means.
	ou, or your representatives, must also cored information, or objects, and mus		
Rule 45(d), relating to y	provisions of Fed. R. Civ. P. 45 are attrour protection as a person subject to a and the potential consequences of n	a subpoena; and Rule 45(e)	
Date: 08/23/2021	_		
	CLERK OF COURT	OR	
			Christopher S. Anulewicz
	Signature of Clerk or Deputy Clerk	<u> </u>	Attorney's signature
The name, address, e-ma	ail address, and telephone number of	the attorney representing (name of party)
Michael T. Chrisley and Ju			r requests this subpoena, are:

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this substitute (date)	ppoena for (name of individual and title, if an	ny)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follow	vs:	
		on (date)	; or	
☐ I returned the	subpoena unexecuted because:			
tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
y fees are \$	for travel and \$	for services, fo	or a total of \$	0.00
I declare under po	enalty of perjury that this information is	s true.		
te:	_	Server's signa	uture	
		_		
		Printed name an	nd title	
		Server's addr	ress	

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- **(B)** within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- **(B)** Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or
- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) **Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:
- (A) *Documents*. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- **(B)** Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- **(D)** Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

for the

Norther	rn District of Ge	eorgia	
MICHAEL T. CHRISLEY and JULIE H. CHRISLEY, Plaintiff V. JOSHUA WAITES, Defendant		ivil Action No.	1:19-cv-4610-LMM
SUBPOENA TO TESTIFY	AT A DEPOSI	TION IN A CIVIL	ACTION
То:	LASHAUN WR	ICHT	
(Name of per		ubpoena is directed)	
Testimony: YOU ARE COMMANDED to a deposition to be taken in this civil action. If you are a party serving this subpoena about the following matt or more officers, directors, or managing agents, or dethese matters: Matters regarding Michael Todd Chrisley, Julie H. Ch	an organization, ters, or those set esignate other po	you must promptly forth in an attachmersons who consent	confer in good faith with the ent, and you must designate one to testify on your behalf about
Place: Balch & Bingham LLP 30 Ivan Allen, Jr. Boulevard, N.W., Suite 700 Atlanta, Georgia 30308	I	Date and Time:	04/2021 10:00 am
The deposition will be recorded by this meth	nod: Stenogra	phic and audiovisual n	neans.
☐ <i>Production:</i> You, or your representatives, m electronically stored information, or objects, material:	•	•	•
The following provisions of Fed. R. Civ. P. 4 Rule 45(d), relating to your protection as a person su respond to this subpoena and the potential consequent	ibject to a subpo	ena; and Rule 45(e)	
Date:08/23/2021			
CLERK OF COURT		OR /s/	Christopher S. Anulewicz
Signature of Clerk or De	eputy Clerk	-	Attorney's signature
The name, address, e-mail address, and telephone nu Michael T. Chrisley and Julie H. Chrisley Christopher S. Anulewicz, Balch & Bingham LLP, 30 Ivan Allen, Jr.		, who issues of	r requests this subpoena, are:

Notice to the person who issues or requests this subpoena

PROOF OF SERVICE

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I received this substitute (date)	ppoena for (name of individual and title, if an	ny)		
☐ I served the su	bpoena by delivering a copy to the nan	ned individual as follow	vs:	
		on (date)	; or	
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tendered to the w	ena was issued on behalf of the United itness the fees for one day's attendance		•	
y fees are \$	for travel and \$	for services, fo	or a total of \$	0.00
I declare under po	enalty of perjury that this information is	s true.		
te:	_	Server's signa	uture	
		_		
		Printed name an	nd title	
		Server's addr	ress	

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(g) Contempt.